

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

Jay Redford

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Plaintiff,

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CASE NO: 1:19-cv-01152-LM

v.

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United States of America

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Department of Housing and

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Urban Development, and

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BLM Companies, LLC, and

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Northsight Property, LLC, and

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Bruce Clark

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Defendants

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**REPLY TO OBJECTION TO MOTION
FOR SUMMARY JUDGMENT**

NOW COMES the Defendant, Bruce Clark, by and through his counsel, Getman, Schulthess, Steere & Poulin, P.A., to offer a reply to the Plaintiff's Objection to the Motion for Summary Judgment. In so-doing, the Defendant incorporates herein by reference the Memorandum in Support of Reply to Objection to Motion for Summary Judgment, and Defense Exhibits E and F, which are being filed herewith, and are fully incorporated herein, as well as the arguments set forth in the Motion for Summary Judgment, Memorandum of Law in Support of Motion for Summary Judgment, and Defense Exhibits A – D, which were filed on or about May 6, 2020 and are also fully incorporated herein.

WHEREFORE, the Defendant Bruce Clark, respectfully asks that this Court:

A) Grant summary judgment in his favor; and

B) Enter such other relief as is just and equitable.

Respectfully submitted,

BRUCE CLARK

By His Counsel,

GETMAN, SCHULTHESS, STEERE
& POULIN, P.A.

Dated: June 9, 2020

By: /s/ Clara E. Lyons
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Reply to Objection to Summary Judgment has this date been served electronically by ECF upon James E. Fiest, Esquire, Michael T. McCormack, Esquire, and Lawrence B. Gormley, Esquire, counsel of record.

Dated: June 9, 2020

By: /s/ Clara E. Lyons
Clara E. Lyons, Esquire (NH Bar #20054)